

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Deere & Company Request for Limited Waiver of	)	
Part 15 of the Commission's Rules for Fixed	)	ET Docket No. 15-184
Television White Space Devices	)	

**REPLY COMMENTS OF THE  
NATIONAL ASSOCIATION OF BROADCASTERS**

The National Association of Broadcasters (NAB)<sup>1</sup> submits the following reply comments in response to the Public Notice in the captioned proceeding.<sup>2</sup> The Office of Engineering and Technology seeks comments on a request for waiver filed by Deere & Company (Deere) to permit the use of a TV white space (TVWS) device manufactured by Koos Technical Services, Inc. (KTS) in certain agricultural applications. The waiver Deere seeks would allow operation of the KTS device on off-road farm equipment at higher power (4 watts) than the Commission's rules permit.<sup>3</sup> NAB does not object to the Deere request for waiver, provided the Commission includes safeguards to minimize the potential for harmful interference.

First, KTS devices operating pursuant to the waiver must be directly connected to, and receive location data from, Deere's StarFire™ GPS system. Deere's waiver request

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<sup>1</sup> The National Association of Broadcasters is a nonprofit trade association that advocates on behalf of free local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

<sup>2</sup> *Office of Engineering and Technology Declares the Deere & Company Request for Waiver of TV White Space Devices Rules to be a "Permit-But-Disclose" Proceeding for Ex Parte Purposes and Requests Comment*, Public Notice, ET Docket No. 15-184, DA 15-947 (Aug. 21, 2015).

<sup>3</sup> See Letter from Mark Lewellen, Manager of Spectrum Advocacy, Deere & Co., and William M. Koss, Jr., President, Koss Technical Services, Inc. to Julius Knapp, ET Docket No. 15-184 (July 13, 2015).

states the devices, “will be geolocation-enabled by virtue of a physical wired data communications connection (such as by Ethernet, USB or serial port).”<sup>4</sup> Second, consistent with Section 15.711(b) of the Commission’s rules, a device must re-register with the TVWS database, and obtain a new list of available channels, whenever the device moves outside of a 50 meter area based on its original location.<sup>5</sup> Third, if the link between the device and the onboard StarFire™ is interrupted for any reason, the KTS device must cease transmitting until it is able to obtain geolocation information through that connection and, if necessary, re-register with the database.

Finally, in addition to the other conditions Deere proposes in its waiver request, the Commission should grant the waiver on a limited, trial basis. Deere seeks a 40-fold increase in permitted power, from 100 mW to 4 W. This may significantly increase the risk of interference to licensed operations and DTV viewers. Accordingly, the Commission should take a cautious approach and limit the number of units allowed under the waiver to no more than 300 devices during the first 12 months of the waiver period. The Commission should also require Deere to promptly report any instances of interference to the Office of Engineering and Technology. This will allow the Commission and interested parties the opportunity to gain real-world experience with Deere’s request, as well as the opportunity to put in place any changes or further protections necessary to prevent harmful interference. If no interference issues arise after 12 months, NAB would support eliminating this limit. Based on discussions NAB has held with Deere and its representatives, we understand that Deere does not object to this requirement.

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<sup>4</sup> *Id.* at 2.

<sup>5</sup> *Id.* at 3.

NAB remains committed to working with TVWS device manufacturers and users to provide them with the flexibility they need to provide new services. At the same time, the Commission must take care to ensure this increased flexibility does not cause harmful interference to licensed operations.

Respectfully submitted,

**NATIONAL ASSOCIATION OF  
BROADCASTERS**

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A handwritten signature in dark ink, appearing to read "Rick Kaplan", with a long horizontal line extending to the right.

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Rick Kaplan  
Patrick McFadden

Bruce Franca  
Robert Weller

October 6, 2015